

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

The Trustees of the California
Ironworkers Field Pension Trust,
California Ironworkers Field Welfare
Trust, California and Vicinity Field
Ironworkers Annuity Fund, California
Field Ironworkers Vacation Trust Fund,
California Field Ironworkers
Apprenticeship Training and Journeyman
Retraining Fund, Ironworkers Workers'
Compensation Trust, California Field
Ironworkers Administrative Trust, and
California Field Ironworkers Labor
Management Cooperative Trust,

Plaintiffs,

vs.

Freyssinet, Inc., a Delaware corporation;
Western Surety Company, a South
Dakota Company; M. A. Mortenson
Company, a Minnesota corporation;
McCarthy Building Companies, Inc., a
Missouri corporation; Federal Insurance
Company, an Illinois corporation; and
Mortenson-McCarthy Las Vegas
Stadium, a Joint Venture, a general
partnership; Merchants Bonding
Company, an Iowa Company; Travelers

Case No.: 2:20-cv-01519-ART-EJY

**STIPULATION TO
DISMISS WITH PREJUDICE ENTIRE
ACTION**

Casualty and Surety Company of
America, a Connecticut surety; John
Does I-XX, inclusive; and Roe Entities I-
XX, inclusive,

Defendants.

The Trustees of the California Ironworkers Field Pension Trust, et al. (“Plaintiffs”), by
and through their counsel, Christensen James & Martin, Chtd., Defendants Freyssinet, Inc.
 (“Freyssinet”) and Western Surety Company (“Western”), by and through their counsel Cozen
O’Connor, Defendants M. A. Mortenson Company, McCarthy Building Companies, Inc.,
Mortenson-McCarthy Las Vegas Stadium, Federal Insurance Company and Travelers Casualty
and Surety Company of America, by and through their counsel, McDonald Carano LLP and
Defendants Raydeo Enterprises, Inc. (“Raydeo”) and Suretec Insurance Company (“Suretec”), by
and through their counsel, Flint Connolly & Walker, LLP, hereby stipulate pursuant to FRCP
41(a)(1)(A)(ii) that the above captioned action is dismissed with prejudice, each side to bear its
own fees and costs.

Dated this 22nd day of September, 2022.

CHRISTENSEN JAMES & MARTIN

COZEN O’CONNOR

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19 IT IS SO ORDERED.

20 

21 ANNE R. TRRAUM
22 UNITED STATES DISTRICT JUDGE

23 DATED: September 23, 2022